

1. Name of Registrant

ARNOLD & PORTER

2. Registration No.

1750

3. This amendment is filed to accomplish the following indicated purpose or purposes:

☐ To correct a deficiency in

☐ Initial Statement

☐ Supplemental Statement for _____

☒ To give a 10-day notice of a change in information as required by Section 2(b) of the Act.

☐ Other purpose (specify) _____

☐ To give notice of change in an exhibit previously filed.

4. If this amendment requires the filing of a document or documents, please list-

Exhibits A and B.

5. Each item checked above must be explained below in full detail together with, where appropriate, specific reference to and identity of the item in the registration statement to which it pertains. If more space is needed, full size insert sheets may be used.

This amendment to Registrant's Registration Statement is to give notice of a new foreign principal of the Registrant, The International Petroleum Exchange of London Limited, and to file the necessary Exhibits A and B.

SEP 21 2 50 PM '81
U.S. DEPT. OF JUSTICE
FEDERAL BUREAU OF INVESTIGATION
RECEIVED
INTERNATIONAL SECURITY SECTION

The undersigned ~~swear~~(s) or affirm(s) that he has *(they have)* read the information set forth in ~~this~~ amendment and that he is *(they are)* familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his *(their)* knowledge and belief.

Brookley Bann

(Both copies of this amendment shall be signed and sworn to before a notary public or other person authorized to administer oaths by the agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions who are in the United States, if the registrant is an organization.)

Subscribed and sworn to before me at Washington D.C.

this 17th day of September, 19 87

Masha O'Learycourt
(Notary or other officer)

My Commission Expires October 31, 1988

My commission expires _____

*Furnish this exhibit for EACH foreign principal listed in an initial statement
and for EACH additional foreign principal acquired subsequently.*

1. Name and address of registrant ARNOLD & PORTER		2. Registration No. 1750
3. Name of foreign principal The International Petroleum Exchange of London Limited	4. Principal address of foreign principal Cereal House 58 Mark Lane London EC3R 7NE, England	

5. Indicate whether your foreign principal is one of the following type:

☐ Foreign government

☐ Foreign political party

☒ Foreign or ☐ domestic organization: If either, check one of the following:

☐ Partnership

☐ Committee

☒ Corporation

☐ Voluntary group

☐ Association

☐ Other (specify) _____

☐ Individual—State his nationality _____

6. If the foreign principal is a foreign government, state: NA

a) Branch or agency represented by the registrant.

b) Name and title of official with whom registrant deals.

7. If the foreign principal is a foreign political party, state: NA

a) Principal address

b) Name and title of official with whom the registrant deals.

c) Principal aim

8. If the foreign principal is not a foreign government or a foreign political party,

a) State the nature of the business or activity of this foreign principal

The foreign principal is a commodity exchange on which various futures and options contracts are traded.

b) Is this foreign principal

- Owned by a foreign government, foreign political party, or other foreign principal Yes ☒ No ☐
- Directed by a foreign government, foreign political party, or other foreign principal Yes ☒ No ☐
- Controlled by a foreign government, foreign political party, or other foreign principal Yes ☒ No ☐
- Financed by a foreign government, foreign political party, or other foreign principal Yes ☒ No ☐
- Subsidized in whole by a foreign government, foreign political party, or other foreign principal Yes ☒ No ☐
- Subsidized in part by a foreign government, foreign political party, or other foreign principal Yes ☒ No ☐

9. Explain fully all items answered "Yes" in Item 8(b). (If additional space is needed, a full insert page may be used.)

We understand that the foreign principal is owned, controlled and financed by its members, many of whom are foreign persons or entities.

10. If the foreign principal is an organization and is not owned or controlled by a foreign government, foreign political party or other foreign principal, state who owns and controls it. NA

Date of Exhibit A
September 17, 1987

Name and Title
Brooksley Born, Partner

Signature

Brooksley Born

INSTRUCTIONS: A registrant must furnish as an Exhibit B copies of each written agreement and the terms and conditions of each oral agreement with his foreign principal, including all modifications of such agreements; or, where no contract exists, a full statement of all the circumstances, by reason of which the registrant is acting as an agent of a foreign principal. This form shall be filed in duplicate for each foreign principal named in the registration statement and must be signed by or on behalf of the registrant.

Name of Registrant	Name of Foreign Principal
ARNOLD & PORTER	The International Petroleum Exchange of London Limited

Check Appropriate Boxes:

- ☐ The agreement between the registrant and the above-named foreign principal is a formal written contract. If this box is checked, attach two copies of the contract to this exhibit.
- ☐ There is no formal written contract between the registrant and foreign principal. The agreement with the above-named foreign principal has resulted from an exchange of correspondence. If this box is checked, attach two copies of all pertinent correspondence, including a copy of any initial proposal which has been adopted by reference in such correspondence.
- ☒ The agreement or understanding between the registrant and foreign principal is the result of neither a formal written contract nor an exchange of correspondence between the parties. If this box is checked, give a complete description below of the terms and conditions of the oral agreement or understanding, its duration, the fees and the expenses, if any, to be received.

(See answer to Number 4, below.)

- Describe fully the nature and method of performance of the above indicated agreement or understanding.

The Registrant will render advice on U.S. laws, regulations and policies that may affect or relate to the activities of the foreign principal. The fee for such representation is to be determined periodically based on usual hourly charges and other criteria for legal fees, plus out-of-pocket expenses. The duration of the agreement is indefinite.

INTERNAL SECURITY
SECTION
REGISTRATION UNIT
SEP 21 2 58 PM '87
RECEIVED
U.S. DEPARTMENT
OF JUSTICE
CRIMINAL DIVISION

5. Describe fully the activities the registrant engages in or proposes to engage in on behalf of the above foreign principal.

The Registrant will render legal advice to the foreign principal with respect to U.S. laws, regulations and policies that may affect or relate to the activities of the foreign principal and will engage in other activities as required in legal representation of the principal.

6. Will the activities on behalf of the above foreign principal include political activities as defined in Section 1(o) of the Act?¹
Yes ☒ No ☐

If yes, describe all such political activities indicating, among other things, the relations, interests or policies to be influenced together with the means to be employed to achieve this purpose.

The Registrant may engage in political activities on behalf of the foreign principal. The Registrant's activities may on occasion include communications on behalf of the foreign principal with Executive Branch officials, officials of government agencies, and with members of the U.S. Senate and House of Representatives and their staffs relating to legislation and actions of the Executive Branch and government agencies that may affect or relate to the foreign principal.

Date of Exhibit B	Name and Title	Signature
September 17, 1987	Brooksley Born, Partner	<i>Brooksley Born</i>

¹Political activity as defined in Section 1(o) of the Act means the dissemination of political propaganda and any other activity which the person engaging therein believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, persuade, or in any other way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

ATTACHMENT 1

Ambassador of the Swiss Confederation
State of Israel
International Commodities Clearing House, Ltd.
The London Commodity Exchange (1986) Ltd.
British American Arts Association (U.K.) Ltd.
The London International Financial Futures
Exchange Ltd.
Korean Traders Association
Republic of Venezuela
Canadian Forest Industries Council
Banco Central do Brasil
Government of Brasil
Consejo Empresarial Mexicano para Asuntos
Internacionales (CEMAI)
Venezolana de Cementos CA
Amok Ltd.
Eldorado Resources Ltd.
Uranerz Exploration and Mining Limited
Saskatchewan Mining Development Corporation
Canadian Meat Council
Profilo Holding A.S.
ASEA A.B.
The Grain and Feed Trade Association
The Metal Market and Exchange Company Limited
International Bank for Reconstruction and
Development (IBRD)
Inter-American Development Bank (IDB)
Province of Saskatchewan
Manitoba Energy Authority
Government of Aruba
Asocolflores
Airbus Industrie
Fair Trade Center
The International Petroleum Exchange of London Limited